

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:
PETER FARAHANI CHEGINI
NAHID MOGHADDAM CHEGINI,
Debtors.

Case No: 6:12-bk-06520-ABB

Chapter 13

NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST FOR HEARING

Pursuant to Local Rule 2002-4, the Court will consider this motion, objection, or other matter without further notice or hearing unless a party in interest files a response within 21 days from the date set forth on the proof of service attached to this paper plus an additional three days for service. If you object to the relief requested in this paper, you must file your response with the Clerk of the Court at 400 West Washington Street, Suite 5100, Orlando, FL 32801, and serve a copy on the movant's attorney, BransonLaw, PLLC, 1501 East Concord Street, Orlando, Florida 32803, and any other appropriate persons within the time allowed.

If you file and serve a response within the time permitted, the Court may schedule and notify you of a hearing, or the Court may consider the response and may grant or deny the relief requested without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

**MOTION TO DECLARE DEBTORS CURRENT AND REINSTATED ON
SECURED CLAIM OF GREEN TREE SERVICING, LLC**

(372 Fairgreen PL, Casselberry, FL 32707, Claim #15)

Come now the Debtors by and through Counsel undersigned and files this Motion to Declare Debtor Current and Reinstated on Secured Claim of Green Tree Servicing, LLC and in support thereof would state as follows:

1. The Debtors filed this case on May 11, 2012.
2. This case was confirmed and later modified on May 5, 2014.
3. The Debtors have made 36 payments to Chapter 13 Trustee and completed their plan in May, 2015.
4. The Debtors received a loan modification with Creditor and the ongoing monthly payment obligation under the loan modification is current to Creditor through May of 2015 via the Chapter 13 Trustee's disbursements.

WHEREFORE, the Debtors request this Court enter an order directing Green Tree Servicing, LLC, to update their records to reflect that the Debtors are current upon completing their plan in May of 2015, and to accept June, 2015's payment and all subsequent timely payments without any charges to the Debtors, and such other relief that may be deemed just and proper in the circumstances.

/s/ Robert B. Branson

Robert B. Branson, Esquire

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing has been sent by either electronic transmission or by US Mail this 27th day of May, 2015 to: Laurie K. Weatherford, Trustee, P.O. Box 3450, Winter Park, FL 32790; Debtor; Bank of America, NA, c/o Taji S. Foreman, Esq., Elizabeth R. Wellborn, PA, 350 Jim Moran Blvd., Ste 100, Deerfield Beach, FL 33442; BANK OF AMERICA, N.A., SUCCESSOR BY MERGER T, Butler and Hosch, PA, 3185 S. Conway Road, Ste E Orlando, FL 32812-7349; Bank of America, N.A., P.O. Box 26012, NC4-105-02-99, Bankruptcy Department Greensboro, NC 27420-6012; Green Tree Servicing LLC, P.O. Box 6154, Rapid City, SD 57709-6154; Bank Of America, N.A., 450 American Street, Simi Valley, CA 93065-6285; PROBER & RAPHAEL, A LAW CORPORATION, 20750 Ventura Boulevard, Suite 100, Woodland Hills, California 91364; Stephen Joseph Modric, Butler & Hosch PA, 3185 South Conway Road, Ste E, Orlando, FL 32812; Tennille M. Shipwash, Trade Centre South, Suite 700, 100 West Cypress Creek Road, Fort Lauderdale, FL 33309

/s/ Robert B. Branson

Robert B. Branson, Esquire
Florida Bar No.: 800988
E-mail: *robert@bransonlaw.com*
John Raffaelli, Esquire
Florida Bar. No.: 808008
E-mail: *john@bransonlaw.com*
Jeffrey S. Ainsworth, Esquire
Florida Bar No.: 060769
E-mail: *jeff@bransonlaw.com*
BransonLaw, PLLC
1501 E. Concord Street
Orlando, Florida 32803
Telephone: (407) 894-6834
Facsimile: (407) 894-8559